IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

INTELLECTUAL VENTURES I LLC and INTELLECTUAL VENTURES II LLC,)))
Plaintiffs,) 14 Civ. 4638 (AKH)
v.))
CITIGROUP, INC., CITICORP, and CITIBANK, N.A.,	ORAL ARGUMENT REQUESTED
Defendants.)))

DECLARATION OF OMAR A. KHAN IN SUPPORT OF DEFENDANTS CITIGROUP, INC.'S, CITICORP'S, AND CITIBANK, N.A.'S MOTION TO STAY THE PROCEEDINGS

- I, Omar A. Khan, declare as follows:
- 1. I make the following declaration based on my personal knowledge and of my own free will. I am over 21 years of age and have never been convicted of a felony. I am a counsel in the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and am admitted to practice in New York. I represent Defendants Citigroup, Inc., Citicorp, and Citibank, N.A.
- 2. Attached hereto as Exhibit A is a true and correct excerpt from the transcript of an August 20, 2014 hearing before Judge Hellerstein in *Intellectual Ventures II LLC v. JP Morgan Chase & Co.*, No. 1:13-cv-03777 (S.D.N.Y.).
- 3. Attached hereto as Exhibit B is a true and correct excerpt from the transcript of an April 4, 2014 hearing before Judge Hellerstein in *Intellectual Ventures II LLC v. JP Morgan Chase & Co.*, No. 1:13-cv-03777 (S.D.N.Y.).

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4. Attached hereto as Exhibit C is a true and correct excerpt from the transcript

of a March 5, 2014 hearing before Judge Hellerstein in Intellectual Ventures II LLC v. JP

Morgan Chase & Co., No. 1:13-cv-03777 (S.D.N.Y.).

I declare under penalty of perjury of the laws of the United States that the foregoing

is true and correct.

Dated: October 7, 2014

New York, New York

/s/ Omar A. Khan

Omar A. Khan